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Johnson & Wales University (JWU) employees and, as may be required by agreement or policy, agents, consultants, representatives, and other affiliated individuals will strive to safeguard the university's financial, legal, and reputational standing and their own credibility and reputations, by promoting objectivity while engaged in research activities.

JWU's Procedures for Identifying and Addressing Financial Conflict of Interest in Research (the "Procedures"), which are based on federal regulations published at [42 CFR Part 50, Subpart E](#), are intended to honor that commitment through the management of financial conflicts of interest (FCOIs) that may arise during research activities supported by federal agencies including, without limitation, the National Science Foundation (NSF) and the U. S. Department of Health & Human Services (HHS), which includes the Public Health Services' Centers for Disease Control and Prevention (CDC), the Food and Drug Administration (FDA), the Health Resources and Services Administration (HRSA), the National Institutes of Health (NIH), and the Substance Abuse and Mental Health Services Administration (SAMHSA).

Many private foundations also require their grantees to abide by the regulations cited above. Unless otherwise directed by law or university policy, individuals employed by or affiliated with JWU who intend on seeking funding from, or who are engaged in research funded by, such foundations will also be required to follow the Procedures.

## Financial Conflict of Interest in Research Procedures

### Terms and Authority

With the exception of terms defined in these Procedures, capitalized terms are defined in [42 C.F.R. § 50.600](#) and elsewhere in the [Public Health Services \(PHS\) FCOI regulations](#)

If [Research](#) is supported by a non-PHS agency or organization with its own requirements governing disclosure, management, and reporting of financial conflicts of interest, and if those requirements are not specifically addressed in these Procedures, then the more restrictive requirements must be followed unless otherwise required by law, university policy, or specific award provisions.

### Investigator Responsibilities

#### Learning/Training

1. Prior to seeking or engaging in any federally sponsored [Research](#), every [Investigator](#) must review and become familiar with JWU's [FCOI Policy](#) and [FCOI regulations](#)
2. Prior to seeking or engaging in any federally sponsored [Research](#), every [Investigator](#) must successfully complete the following courses [or other federally approved courses approved by the Institutional Official, whose responsibilities are described in [42 C.F.R. § 50.604\(d\)](#)] through the [Collaborative Institutional Training Initiative \(CITI\)](#):
  - a. Financial Conflicts of Interest: Overview, Investigator Responsibilities, and COI Rules (ID 15070)





fulfill its reporting obligations to the federal sponsor prior to the expenditure of any federal funds and within 60 days of any subsequently identified [FCOI](#).

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Role in the project      Department

Principal Investigator	Project Director	Other Senior/Key Personnel
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Employer (if not JWU)

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**Project information:**

Title

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Beginning date      Click or tap to enter a date.      Ending date      Click or tap to enter a date.

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Sponsor (if any)

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**Type of Disclosure:** Choose an item.

**Most recent date**

**Travel**

- Have you, your spouse/domestic partner or your dependent child received any travel reimbursement or been sponsored for travel (i.e., travel expenses paid and not reimbursed so that

**Part B**

**Disclosure of Significant Financial Interests**

Please complete this page for each entity in which you have a Significant Financial Interest (“SFI”). Use a different page for each person (i.e., you, your spouse/domestic partner, or dependent child) who has an SFI. For further guidance, please see JWU’s Financial Conflict of Interest Policy and [42 C.F.R. Part 50, Subpart F](#).

**Investigator information:**

Name \_\_\_\_\_ Campus \_\_\_\_\_  
E-mail address \_\_\_\_\_ College \_\_\_\_\_  
Preferred phone # \_\_\_\_\_ Department \_\_\_\_\_

**Information of person with SFI (if different from above):**

Name \_\_\_\_\_ Campus \_\_\_\_\_  
Email address \_\_\_\_\_ College \_\_\_\_\_  
Preferred phone # \_\_\_\_\_ Department \_\_\_\_\_

**Entity in which the Investigator (or Investigator’s spouse/domestic partner or dependent child) has an SFI:**

Name \_\_\_\_\_  
Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Website \_\_\_\_\_

**Form of compensation**

Salary	Fees (e.g., honoraria, consulting, authorship, etc.)
Stock, stock option, or other ownership interest	Intellectual property interest
Other: _____	_____

Approximate value of compensation \_\_\_\_\_

Description of compensation

Description of relationship to the entity  
and/or work performed for it